

COLSON LAW

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September 16, 2016

By ECF

The Honorable Dora Irizarry
United States District Court
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Ying Lin*, 15 CR 601 (DLI)

Dear Judge Irizarry:

I write to request permission to file a response to the government's supplemental memorandum of law in support of its motion for a pretrial conference pursuant to Section 2 of the Classified Information Procedures Act ("CIPA"). I do not oppose a conference under Section 2 of CIPA. However, I do object to the government's request, pursuant to Section 4 of CIPA, to file an *in camera*, *ex parte* application regarding classified materials it seeks to delete, substitute, or disclose pursuant to a protective order.

Should the Court permit me to file a response, I will do so by September 21, 2016, to allow time for the Court to review both memos before the next conference on September 27, 2016. In the alternative, I have no objection to an adjournment of the conference.

Thank you for your consideration.

Respectfully submitted,

/s/

Deborah Colson
(212) 257-6455

cc: AUSA Alex Solomon
AUSA Doug Pravda
AUSA Ian Richardson